

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**IMAGE MASTERS, INC., *et al.***

**Debtors.**

**LYNN FELDMAN, as Chapter 7 Trustee of the  
Estate of Image Masters, Inc., *et al.***

**Plaintiff,**

**v.**

**ABN AMRO MORTGAGE GROUP, INC., *et al.*,**

**Defendants.**

**CHAPTER 7**

**Case No. 07-21587(MDC)**

**Jointly Administered**

**Adv. Nos. 09-2092(MDC)**

**Administratively and  
Substantively Consolidated  
with 09-2143(MDC)**

**MOTION FOR LEAVE TO FILE UNDER SEAL CERTAIN EXHIBITS  
ATTACHED TO PLAINTIFF'S OMNIBUS MEMORANDUM OF LAW IN  
OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Trustee-Plaintiff Lynn Feldman ("Plaintiff") hereby moves this Court for entry of an order authorizing Plaintiff to file under seal the Designated Exhibits (defined herein), attached to her Omnibus Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment, filed contemporaneously herewith, and in support thereof states as follows:

1. This Court set June 17, 2019 as the deadline for Plaintiff to file her response to the Defendants' Motions for Summary Judgment (the "Motions"). *See* Doc. No. 348.
2. Plaintiff is on the date of this motion filing an Omnibus Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment (the "Opposition").
3. On December 19, 2014, this Court entered an Order Amending Agreed Confidentiality and Protective Order (Doc. No. 178) (the "Confidentiality Order") that preserves

the confidentiality of various protected documents produced in discovery or otherwise used in this action.

4. In support of her Opposition to the Defendants' Motions, Plaintiff is submitting the Declaration of Francis X. Lane ("Lane Declaration") and accompanying exhibits. Certain exhibits have been designated by the Defendants or by Plaintiff as "Confidential" or "Attorneys' Eyes Only" pursuant to the Confidentiality Order:

EXHIBIT 7	EXHIBIT 40	EXHIBIT 67	EXHIBIT 93
EXHIBIT 8	EXHIBIT 41	EXHIBIT 68	EXHIBIT 94
EXHIBIT 9	EXHIBIT 42	EXHIBIT 69	EXHIBIT 95
EXHIBIT 10	EXHIBIT 43	EXHIBIT 70	EXHIBIT 96
EXHIBIT 11	EXHIBIT 44	EXHIBIT 71	EXHIBIT 97
EXHIBIT 14	EXHIBIT 45	EXHIBIT 72	EXHIBIT 98
EXHIBIT 15	EXHIBIT 46	EXHIBIT 73	EXHIBIT 99
EXHIBIT 16	EXHIBIT 47	EXHIBIT 74	EXHIBIT 100
EXHIBIT 17	EXHIBIT 48	EXHIBIT 75	EXHIBIT 101
EXHIBIT 18	EXHIBIT 49	EXHIBIT 76	EXHIBIT 102
EXHIBIT 19	EXHIBIT 50	EXHIBIT 77	EXHIBIT 103
EXHIBIT 25	EXHIBIT 51	EXHIBIT 78	EXHIBIT 104
EXHIBIT 26	EXHIBIT 52	EXHIBIT 79	EXHIBIT 105
EXHIBIT 27	EXHIBIT 53	EXHIBIT 80	EXHIBIT 106
EXHIBIT 28	EXHIBIT 54	EXHIBIT 81	EXHIBIT 107
EXHIBIT 29	EXHIBIT 55	EXHIBIT 82	EXHIBIT 108
EXHIBIT 30	EXHIBIT 56	EXHIBIT 83	EXHIBIT 109
EXHIBIT 31	EXHIBIT 57	EXHIBIT 84	EXHIBIT 110
EXHIBIT 32	EXHIBIT 58	EXHIBIT 85	EXHIBIT 111
EXHIBIT 33	EXHIBIT 59	EXHIBIT 86	EXHIBIT 112
EXHIBIT 34	EXHIBIT 60	EXHIBIT 87	EXHIBIT 113
EXHIBIT 35	EXHIBIT 62	EXHIBIT 88	EXHIBIT 114
EXHIBIT 36	EXHIBIT 63	EXHIBIT 89	EXHIBIT 115
EXHIBIT 37	EXHIBIT 64	EXHIBIT 90	EXHIBIT 116
EXHIBIT 38	EXHIBIT 65	EXHIBIT 91	EXHIBIT 117
EXHIBIT 39	EXHIBIT 66	EXHIBIT 92	EXHIBIT 118

The above-listed exhibits are referred to herein as the "Designated Exhibits."

5. As the Designated Exhibits have been designated by the parties as "Confidential" and/or "Attorneys' Eyes Only" under the Confidentiality Order, Plaintiff seeks to file them under seal. The Designated Exhibits consist of Defendants' Rule 30(b)(6) testimony and certain other

documents produced by the Defendants or Plaintiff. Many of the Designated Exhibits are loan-related documents containing non-public personal information regarding victims of the Image Masters Ponzi scheme.

6. Plaintiff respectfully requests that this Court enter an order allowing her to file the Designated Exhibits only under seal.

7. Sufficient information is contained in the publicly-filed Opposition and other non-confidential exhibits attached to the Lane Declaration to support and explain the basis for Plaintiff's Opposition to the Defendants' Motions. The Designated Exhibits simply contain specific supporting materials for information that is otherwise publicly filed.

8. For the foregoing reasons, this Court should allow Plaintiff to file the Designated Exhibits only under seal.

WHEREFORE, Trustee-Plaintiff Lynn Feldman respectfully requests that this Court enter an Order allowing her to file the Designated Exhibits only under seal.

Dated: June 17, 2019

KAUFMAN, COREN & RESS, P.C.

/s/ Steven M. Coren

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*Special Counsel for Lynn Feldman,  
Chapter 7 Trustee*

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**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2019, upon consideration of Plaintiff's

Motion for Leave to File Under Seal Certain Exhibits Attached to Plaintiff's Omnibus

Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment, **IT IS**

**HEREBY ORDERED** that the motion is **GRANTED**. Plaintiff is authorized to file the

following Exhibits only under seal:

EXHIBIT 7	EXHIBIT 26	EXHIBIT 38	EXHIBIT 50
EXHIBIT 8	EXHIBIT 27	EXHIBIT 39	EXHIBIT 51
EXHIBIT 9	EXHIBIT 28	EXHIBIT 40	EXHIBIT 52
EXHIBIT 10	EXHIBIT 29	EXHIBIT 41	EXHIBIT 53
EXHIBIT 11	EXHIBIT 30	EXHIBIT 42	EXHIBIT 54
EXHIBIT 14	EXHIBIT 31	EXHIBIT 43	EXHIBIT 55
EXHIBIT 15	EXHIBIT 32	EXHIBIT 44	EXHIBIT 56
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EXHIBIT 19	EXHIBIT 36	EXHIBIT 48	EXHIBIT 60
EXHIBIT 25	EXHIBIT 37	EXHIBIT 49	EXHIBIT 62

EXHIBIT 63	EXHIBIT 77	EXHIBIT 91	EXHIBIT 105
EXHIBIT 64	EXHIBIT 78	EXHIBIT 92	EXHIBIT 106
EXHIBIT 65	EXHIBIT 79	EXHIBIT 93	EXHIBIT 107
EXHIBIT 66	EXHIBIT 80	EXHIBIT 94	EXHIBIT 108
EXHIBIT 67	EXHIBIT 81	EXHIBIT 95	EXHIBIT 109
EXHIBIT 68	EXHIBIT 82	EXHIBIT 96	EXHIBIT 110
EXHIBIT 69	EXHIBIT 83	EXHIBIT 97	EXHIBIT 111
EXHIBIT 70	EXHIBIT 84	EXHIBIT 98	EXHIBIT 112
EXHIBIT 71	EXHIBIT 85	EXHIBIT 99	EXHIBIT 113
EXHIBIT 72	EXHIBIT 86	EXHIBIT 100	EXHIBIT 114
EXHIBIT 73	EXHIBIT 87	EXHIBIT 101	EXHIBIT 115
EXHIBIT 74	EXHIBIT 88	EXHIBIT 102	EXHIBIT 116
EXHIBIT 75	EXHIBIT 89	EXHIBIT 103	EXHIBIT 117
EXHIBIT 76	EXHIBIT 90	EXHIBIT 104	EXHIBIT 118

**SO ORDERED.**

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COLEMAN, J.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this 17th day of June, 2019, caused to be served the foregoing Motion for Leave to File Under Seal Certain Exhibits Attached to Plaintiff's Omnibus Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment upon all counsel registered to receive electronic notices in this adversary proceeding.

/s/ Steven M. Coren

Steven M. Coren